

### **REMARKS**

Claims 1-83 were pending. By virtue of this response, claims 1, 18-20, 32-34, and 40 are amended. Therefore, claims 1-83 are presently pending. Amendment of certain claims is not to be construed as a dedication to the public of any of the subject matter of the claims as previously presented. No new matter is added.

#### **I. Interview Summary**

Applicants thank the Examiner for the interview conducted June 9, 2010. Interview attendees included: Examiner K. Stork, Supervisor S. Hong, and Applicants' representatives P. Yim and B. Guggenheimer. Claim 1 was discussed with respect to the Halahmi (US 2003/0011631) and Morris (WO 03/079227) references. During the interview, the Examiner suggested amending the claims to clarify that the definition information is downloaded in response to the user request for the page. The Examiner indicated that claim 1, as amended, is not obvious over the cited prior art. Specifically, the Examiner agreed that Halahmi is not suitable as a primary reference in a 103 combination.

Additionally, Supervisor Hong suggested amending the claims to further distinguish the invention from existing methods that merely apply different styles to an HTML document. In particular, Supervisor Hong suggested that we clarify that switching the onscreen representation includes a replacement of one onscreen representation with another onscreen representation.

#### **II. Claim Rejections – 35 USC §103**

Claims 1, 15-20, 32-41, and 55-58 stand rejected under 35 U.S.C. 103(a) as purportedly being unpatentable over Halahmi in view of Morris.

Applicants submit that the cited references fail to disclose all of the limitations of claim 1. Applicants further submit that the modification, as proposed by the Examiner, would change the principle of operation of Halahmi, and therefore is improper under MPEP 2143.02.

First, the references fail to disclose or suggest a judging whether or not acquisition of the entirety of the definition information is obtained from over the network. As recited in claim 1, the judging occurs after performing an operation on obtained part of data of the page. Specifically, the judging occurs after “performing a text browsing mode on the obtained part of

data of the page in parallel with the obtaining operation of the page and definition information.” (Emphasis added.) Furthermore, because the references fail to disclose a judging, the references also do not disclose switching an on screen representation, depending on a result of the judging.

In general, Halahmi describes dividing an HTML document into multiple portions for presentation on a user’s display. (Halahmi at [0016].) In Halahmi, there are two types of devices that receive a document – a portion server and a user device. (*Id.* at [0037] and [0062].) Neither of these devices performs a judging whether or not definition information is obtained from over the network.

The portion server in Halahmi receives a document from the Web and divides the document into portions. (*Id.* at [0038].) Halahmi’s portion server applies formatting and display attributes to each portion of the document so that the portions appear substantially similar to the content in the original document. (*Id.* at [0052-0055].) Because the attribute information appears throughout the document (see, e.g., *id.* at [0057]-[0058]), the portion server necessarily obtains the entire document from the Web before deciding how to divide the document into portions and apply the formatting and attributes. (See, e.g., [0038]-[0039].) Therefore, the portion server cannot perform a judging whether or not acquisition of the entirety of definition information is obtained over the network, particularly if the judging occurs after performing an operation on the page (e.g., performing a text browsing mode).

In Halahmi, the constructed portions are sent from the portion server to a user device for display. (*Id.* at [0062].) In Halahmi, an individual portion is not displayed until the download of the portion is complete. (*Id.* at [0063]-[0064].) Furthermore, the individual portions have already been constructed by the portion server so that their appearance is similar to the original document. Therefore, there is no need to obtain definition information or perform a judging that the definition information has been obtained.

Furthermore, because Halahmi does not perform a judging, Halahmi cannot switch an onscreen representation in response to the judging.

Morris does not remedy these deficiencies in the Halahmi reference. In general, Morris describes the presentation of web content according to a user-selectable mode. (Morris at p. 3, lines 19-26.) In Morris, the web content is presented only after the content and preference information has been received by the user’s device (Morris at pp. 8-9.) Thus, Morris does not

judge whether or not acquisition of the entirety of the definition is obtained after performing text browsing mode on the obtained part of data of the page. Furthermore, assuming, for the sake of argument, that the user selection of a display mode is analogous to the switching of claim 1, the selection occurs in response to a user selection and not a judging whether or not definition information is obtained from the network.

Accordingly, Halahmi and Morris, alone or in combination, fail to disclose or suggest a judging whether or not acquisition of the entirety of the definition information is obtained from over the network. Furthermore, because the references fail to disclose a judging, the references also do not disclose switching an on screen representation, depending on a result of the judging.

Additionally, Applicants submit that the proposed modification would change the principle of operation of Halahmi, and therefore is improper under MPEP 2143.02.

As described above, Halahmi uses a portioning server to construct document portions that are formatted so that they appear substantially similar to the content in the original document.

[If a section is divided over two or more portions, the attributes of that section are preferably assigned to each portion which contains any part of the section, such that the section is displayed with substantially similar or identical attributes even when divided into one or more portions.

(Halahmi at [0039], emphasis added.)

Preferably, the attribute(s) of the delineated section associated with the parsed data are also constructed, such that these display attributes are preserved when displaying the portion on the display screen.

(Halahmi at [0055], emphasis added.)

The user-device in Halahmi is used to display the formatted and constructed portions of the document, as they are provided by the portion server. This is a key feature of Halahmi as the portion server (which necessarily receives the entire document) is able to construct the individual portions so that the appearance of the content is substantially consistent with the appearance of other portions of the document (some portions yet to be received by the user device). Modifying Halahmi to incorporate the user-selectable mode in Morris would require that the appearance of the content to be driven, at least in part, by the user-device. In order to preserve the substantially consistent appearance between page portions, the user-device would have to somehow drive the construction of the page portions that are not yet received by the user-device so that they are

consistent with other portions of the document. This modification would necessarily change the principle of operation of Halahmi, and is therefore improper.

In conclusion, Applicants submit that claim 1 is not obvious over Halahmi in view of Morris. Independent claims 18-20, 32-40, and 58 also recite a judging whether or not definition information has been obtained and a switching based on the judging. Applicants submit that these claims are allowable for at least the reasons stated above. Furthermore, claims 15-17, 41, and 55-57 are allowable for at least the reason that they depend from allowable claims. Accordingly, Applicants respectfully request that the rejection of claims 1, 15-20, 32-41, and 55-58 be withdrawn and the claims allowed.

Claims 2, 5-7, 9, 21, 24-26, 28-29, 42, 45-47, 49, 59, 62-64, 66, 72, 75-77, and 79 are rejected under 35 U.S.C. 103(a) as being unpatentable over Halahmi and Morris, and further in view of Sai (US 2004/008531). Further, claims 10-12, 14, 50-52, 54, 67-69, 71, 80-82, and 84 are rejected under 35 U.S.C. 103(a) as being unpatentable over Halahmi and Morris, and further in view of Brosnahan (US 7,082,577). Lastly, claims 13, 53, 70, and 83 are rejected under 35 U.S.C. 103(a) as being unpatentable over Halahmi, Morris, and Brosnahan and further in view of Chang et al. (US 2002/0010707). .

In response, Applicants submit that Sai, Brosnahan, and Chang each fail to cure the deficiencies of Halami and Morris. As such, for at least the foregoing reasons, claims 2, 5-7, 9-14, 21, 24-26, 28-29, 42, 45-47, 49-52, 54, 62-64, 66-72, 75-77, and 79-84 are allowable. Accordingly, Applicants request reconsideration and allowance of claims 2, 5-7, 9-14, 21, 24-26, 28-29, 42, 45-47, 49-52, 54, 62-64, 66-72, 75-77, and 79-84.

**III. Allowable Subject Matter**

Applicants thank the Examiner for indicating claims 3-4, 8, 22-23, 27, 30-31, 43-44, 48, 60-61, 65, 73-74, and 78 contain allowable subject matter. However, claims 3-4, 8, 22-23, 27, 30-31, 43-44, 48, 60-61, 65, 73-74, and 78 are objected to for being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims.

In response, Applicants do not believe such an amendment is necessary in view of the amendments and remarks included in this document.

**CONCLUSION**

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, Applicants petition for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account 03-1952** referencing **Docket No. 448252001300**. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

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Respectfully submitted,

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